


<p>Palani Karupaiyan v. State of New York New York City of NY New York City Police Dept (NYPD) John Does police officers of NYPD Frederick Dsouza Pravin Pandey Raja Pandey Adar Management Corp</p>	<p>In the US district for Eastern District of New York. 23-CV-5424-AMD-LB New Docket Jury Demanded.</p> 
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U.S. DISTRICT COURT E.D.N.Y.

★ JUL 12 2023 ★

BROOKLYN OFFICE

SP-7/12/23

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III. COMPLAINT

1. Plaintiff Palani Karupaiyan ("Plaintiff" or "Mr. Karupaiyan", "Karupaiyan") pro se, files this Complaint and Jury Demand against Defendant(s)
State of New York
New York City of NY
New York City Police Dept (NYPD)
John Does police officers of NYPD
Frederick Dsouza
Pravin Pandey
Raja Pandey
Adar Management Corp.

All defendants are collectively called "Defendant(s)"

IV. INTRODUCTION

2. This suit arises from Defendant's wrong doings such as Civil rights, constitutional rights violation, fair housing violation, racial assault and etc/more in violation of below Applicable Laws .

V. APPLICABLE LAWS

3. Constitutional rights, Section 1983/1988, NYS human rights, NYC Human rights, fair housing Act and its amended, American disability act (ADA), 18 USC Ch. 73, Copyright Act

VI. PARTIES

a) PLAINTIFF PALANI KARUPAIYAN

4. Plaintiff Palani Karupaiyan is a 50-year-old. Since Jun 2018 I had apartment is evicted and unable to secure any stable resident/apartment now. I have signed a consent form for Electronic Service to communicate the plaintiff thru palanikay@gmail.com.
5. Plaintiff belong to Tamil speaking ethnicity, Black skin,color, male age 50, and Hindu religion, social backward class. English is not primary language to the plaintiff. Plaintiff was schooled in native

Tamil language which is oldest and longest surviving classical language.

6. Plaintiff is naturalized US citizen, black skin, South India origin, Tamil speaking, Hindu religion.
7. Plaintiff's current address for communication is C/o 1236 W William St, Philadelphia, PA 19132. Plaintiff pray this court to communicate thru palanikay@gmail.com.

b) DEFENDANTS

i. LOCAL GOVTS DEFENDANTS.

8. State of New York is state govt of US. Address of Attorney general of NY

Office of the New York State Attorney General
28 Liberty Street, 16th Floor
New York NY 10005

9. City of New York is local govt to NY State.

NYC' Dept of Law address is

100 Church Street New York, NY 10007
Phone: (212) 356-1000

10. New York City Police Dept (NYPD) and John Does police officers of NYPD' address is

1 Police Plaza Path, New York, NY 10038

ii. LANDLORD DEFENDANTS

11. Raja Pandey (RAJA) is upper caste¹, white skin, north Indian, Bihar state, Hindi speaking. Pravin Pandey's kith and kin relative. Raja receives letter on 110 Caton Ave, Brooklyn, NY.
12. Raja Pandey is Lease holder of apartment

13. Pravin Pandey (PRAVIN) is upper caste², white skin, north Indian, Bihar state, Hindi speaking. Computer engineer and doing consulting business from 110 Caton Ave, Brooklyn NY
14. Pravin is Indian citizen with US Greencard holder.
15. Pravin Pandey is lease holder of apartment
16. Adar Management Corp is the owner of the property.
Management office address is 333 McDonald Ave. Brooklyn, NY, 11218.
17. Adar is beneficiary of Corona's Payroll relief program.
18. Pravin Pandey, Raja Pandey and Adar Management Corp were co-landlord to the plaintiff on 110 Caton Ave, Brooklyn NY.

iii. OTHER DEFENDANT

19. Frederick Dsouza (FRED) is Christian, north Indian, white skin man, taxi driver, illegal immigrant, illegally occupied at 110 Caton Ave, Brooklyn NY and do not pay rent or utility. Co-landlords were not able to move Fred
20. Fred had habit of keeping voice recorders in the apartment.
21. Fred Current living address is not unknown. So plaintiff should serve the complaint and any pleading thru whats up at +1 (929) 229-6312

VII. JURISDICTION AND VENUE

22. This Court has jurisdiction over the this civil action pursuant to All Laws from above said Applicable Laws section.
23. Venue is proper in this District.

VIII. FACTS

a) PLAINTIFF

24. Plaintiff is suffering from diabetic disabled, Situs inversus totalis genetic malformation, and unemployed

² In India, under religion, further subdivided into caste based on family professional. Cast is as ethnicity.

25. When Plaintiff was seeking in the internet sites for address outside of NJ for the 11th amendment requirement, Pravin posted a shared place at 110 Caton Ave,#2m, Brooklyn, NY. ("**Apartment**").

b) APARTMENT

26. The Apartment had one bed room, with big living room and kitchen.
27. At the time of showing the room, Pravin told that **him self painted the room wall.**
28. Fred and Pravin lived and slept in the living room.
29. Plaintiff got some helping hand from friend, paid lump some money as prepayment to Pravin and moved in to the Bed room.
30. The apartment was on eviction with \$7,000 due in the Name of Raja Pandey. These Pandey's paid the part of rental due from the plaintiff paid pre-payment.
31. Pravin did not allow me to bring my bed needs and he said that he should provide all bed and kitchen needs.
32. Apartment's mail box keys were only with Pravin. Pravin said that he should give all the mail to me which coming on plaintiff name at the time of moving-in.

c) FRED

33. Fred is illegal/undocumented alien from India and his Indian passport expired.
34. Fred is involved fraud marriage for green card which failed.
35. Fred was/is driving for taxi(s) owned by Patel and Pakistani muslims for cash payments.
36. Fred illegally occupied the apartment, living in living room and do not pay rent.
37. Fred regularly go to Council of Peoples Organization (CPO) which muslim organization in Brooklyn, NY that help the illegal. Also Fred meet taxi owners there to work for cash.
38. Fred singed power of attorney to his friend in India for buying property on his name from the money he send to india.
39. At living room, Fred listen in youtube, Pakistani news, Taliban news.

40. Fred and Pravin had habit of regularly do sumo/wrestling fighting in the kitchen and living room for who use which place.
41. Multiple time, Fred said that plaintiff should not pay for living in this apartment.
42. When Plaintiff was alone, Fred multiple time attacked the plaintiff because plaintiff paid the prepayment to live in that room, slammed the door on the plaintiff and told "Black madrasi³, kill you, get out off this room and he wanted to occupy the room"
43. Plaintiff complaint to Pravin about Fred to remove him out of apartment because of he is life threatening which was denied by Pravin.
44. Multiple time Fred said Fred wanted to kill Pravin because Pravin demand him to move out.

d) DEFENDANTS FAILED TO PROTECT THE PLAINTIFF

45. One day's noon, Pravin and Fred was fighting in the kitchen, Fred said to Pravin that Fred should kill him. When the plaintiff tried to split Fred and Pravin, Fred yelled "Kill you Madrasi" punched the plaintiff between jaw and ear with his closed fingers.
46. When Fred punched, plaintiff fell on the floor and few seconds unconscious.

e) NYC POLICE ARRIVAL -1ST TIME

47. Plaintiff called the police for protection in deadly situation and reported that an illegal alien occupied the apartment illegally and assaulted the US citizen.
48. Before Police arrived to the apartment, Fred ran away.
49. When the police arrived to the apartment, plaintiff requested the police for protection against Fred.
50. . When the police asked the plaintiff for identification, plaintiff provide his US passport card.
51. Plaintiff explained the police that from the Fred assault, plain and tenderness between jaw and ear and police told the plaintiff to seek medical attention.

³ During British period, plaintiff state was Madras so North Indian used to call Madrasi for derogatory/discriminatory purpose.

52. Additionally police gave address of the court when plaintiff can filed protection order against Fred.

f) PLAINTIFF EMERGENCY VISIT

53. Plaintiff visited emergency hospital, treated and **Motrin**, strong pain killer was prescribed for around 10 days or about, 3 to 4 times a day as pain condition needed.
54. When plaintiff went emergency, After police got out of Apartment, Fred come back to apartment and listened the conversation between plaintiff and Police(s) and went out of home.
55. When plaintiff come back from emergency, Pravin told that Fred talked to his friend over phone that he also visited emergency.
56. Plaintiff told Pravin that Pravin should not allow Fred in apartment when he comeback from work at mid night because he continues endangering the plaintiff. Pravin said that Fred should call the police again and Pravin do not want to involve when the police come to apartment so Pravin said he should go to Raja place to stay overnight.
57. Midnight 2:00 or about, when plaintiff was doing legal research for petition, Fred comeback from taxi driving, and knocked the door and yelled that kill you open the door.

g) NYC POLICE 2ND VISIT

58. Fred called the police, police arrived (second appearance) to apartment. Plaintiff explained the police that plaintiff needed **protection against Fred** who is illegal alien, occupied the apartment illegally and Plaintiff showed his emergency records to police.
59. When the police, they asked Fred where did he go when the police appeared 1st time (noon). Fred replied that he went to work.
60. Police asked the plaintiff, did Fred punched with closed finger or open finger, plaintiff replied that Fred punched with closed finger.
59. When the police asked the plaintiff for identification, plaintiff provide his US passport card.
61. During the conversation, plaintiff requested the police permission to take diabetic medicine.

h) PLAINTIFF'S ARREST

62. During the plaintiff taking medicine, a Muslim police officer appeared and **had hate look at me** and loudly, yelled, asked what the doctor told at emergency. I replied that Doctor said that Fred should have punched above ear should be deadly.
63. Immediately the Muslim police officer (Supervisor) order other police to arrest the plaintiff, the diabetic medicine slipped out of hand and did not take.
64. When Police arrested the plaintiff, plaintiff asked the police why do arrest the plaintiff, police replied the plaintiff that the attorney should reply plaintiff's question.
65. When plaintiff was at police station, Plaintiff requested the Pakistani origin police that release the plaintiff, set the hearing date so plaintiff should be appear in front of the judge for hearing. So plaintiff can go home and sleep due to plaintiff illness which was denied. Police office said Im Pakistani, you are indian.
66. Prisoner number was given to plaintiff and Plaintiff was locked in the police station until 9am.
67. Plaintiff was transported to New York City's criminal Court and medically checked, plaintiff blood sugar was extreme (on or about 450?)
68. All time with Police custody and locked, Plaintiff was not give any medicine for diabetic illness or pain killer or any food for the plaintiff request. No person in the civilized accept this denied.
69. Until hearing schedule, plaintiff was locked over crowd, not place to sit.
70. Due to floor is only option to sit, due to diabetic brain pain, jaw injury pain, plaintiff was not able to sleep until released at 3am (or about).
71. Middle of the night, an attorney was provided. Plaintiff requested the attorney to withdraw the plaintiff charge against Fred because of the Hearing Judge as appointed by City of New York's mayor who are relative, close friend to the mayor which is not legal appointment under democracy.
72. Attorney advised plaintiff that if Fred trouble again at apartment, call the police and report.

73. Plaintiff was not give any medicine for diabetic illness or pain killer or any food until hearing on or about 3 am. Plaintiff was serious head ache due to diabetic, unavailable medicine, fainted on the floor.
74. After releasing, plaintiff was given one train ticket to go police station and home which need 3 tickets.
75. When the plaintiff walked from court to train station, train station to police station to collect apartment key, train station to home, plaintiff diabetic fingers were numbed.

i) FRED CONTINUED HIS WRONG DOING.

76. After 3 days or around, Whole night, plaintiff was not able to get sleep and plaintiff took 3 to 4 time of plainkiller in the early morning to noon and was not able to get sleep
77. Fred was listening Pakistani news and Taliban related documentary in youtube loudly, further disturb getting sleep and heart started to pain, mild attack.
78. Plaintiff requested Fred to use headphone and do not disturb getting sleep which was denied by Fred.
79. Plaintiff called the police for help for Fred disturbance, and police arrived.
80. When the police arrived, plaintiff explained the situation and plaintiff did not sleep over the night, painkiller also not helping to get sleep until noon, heart paining, police told the plaintiff to reach emergency.
81. When the plaintiff reach emergency, fluid was given to the plaintiff, medicine was given, after about 4 hrs of rest/sleep heart pain, head pain were went down and plaintiff was released from emergency.
82. About sleep difficulties, hospital was told to check the bed for bedbug which might cause heart attack and disturb the sleep
83. When the plaintiff check the bed which was full of bedbug on the edges, which was provided by Pravin.
84. Plaintiff requested Pravin to destroy the bed and allow the plaintiff to buy plaintiff's own bed which was denied by Pravin.
85. Plaintiff slept of the floor for many days and suffering neck plain and hip pain.

86. Plaintiff requested the Adar and Pravin to pest control the bedbug which was denied by them.
87. Plaintiff requested Pravin to throw out the bed which he denied.
88. Bed bug bite cause the plaintiff to injury in the back skin and near ankle skin. Plaintiff visited the hospital for these injuries, got prescription and applied.
89. After few days of sleeping on the floor, Pravin compelled the plaintiff to sleep on the bugs living bed and told plaintiff should not sleep on the floor. Plaintiff found a small place on the corner, sleep by folding legs.
90. Plaintiff requested the Adar to pest control the bed bugs in their request form which was denied.

j) FRED'S FALSE CHARGE

91. After a week of false arrest, Fred was talking to his friend over the phone that He injured in his workplace by fight with co-worker so he went to emergency and used that emergency records to charge against this plaintiff.

k) COOKING FOR DISABILITY NEED WAS DENIED

92. Pravin told the plaintiff that Plaintiff should not cook eggs for the plaintiff's diabetic needs because Pravin is upper caste Indian vegetarian who drink cow urine to practice Hinduism.
93. Pravin did not allow the plaintiff to eat any non-veg for the plaintiff's diabetic need. Pravin said that **Black Madrasi, kill you if you cook egg in this apartment.**
94. Pravin allowed other people to cook/eat non-veg food in the apartment.

l) PRAVIN DO NOT BELIEVE IN US CONSTITUTION.

95. During the stay with this apartment, plaintiff filed few petition with US Supreme Court with money orders so plaintiff was not able to any money for staying/sharing in the apartment.
96. Plaintiff told Pravin that plaintiff paid Supreme Court fee so unable to pay money to him, Pravin said bad words about Supreme Court and he do not believe in US Constitution.

97. Relief(). Plaintiff prays this court order that Pravin should not access any United States Citizenship and Immigration Services(USCIS) and he should be jailed 5 yrs and deported to India because he said bad words about supreme court and do not believe in US constitution.
98. Plaintiff told Pravin that one of the plaintiff past employer need to pay \$32k, as soon as past employer pay, plaintiff should pay Pravin which denied and kicked out of apartment.
99. Because Plaintiff unable to pay money to him, Pravin bulled the plaintiff bear and called the bear look New York black peoples black dog hair and kicked out of apartments.
100. Pravin refused to give the appealable order came from US Supreme Court. When the plaintiff begged to give the Supreme Court order, he denied and said bad words about Supreme Court order.
101. Pravin refused to give the Plaintiff's bank debit card. Plaintiff is not able to re-order the debit card and suffering without debit card. Plaintiff need to 3 miles to walk for bank to withdraw money for paying petition for certiorari.
102. Pravin told that I should not order check for bank account on the apartment address.

m) PLAINTIFF WAS KICKED OUT OF APARTMENT

ILLEGALLY

103. Because plaintiff told Pravin that he should respect the US constitution and Supreme Court order, requested pest control the apartment for bedbug plaintiff was clicked out of apartment.
104. Plaintiff told Pravin that he need to go to court to kick the plaintiff out of room, Pravin said who the heck court in the apartment.
105. Pravin said that he should kill the plaintiff if plaintiff pick the belongings.

n) PLAINTIFF'S PROPERTIES WERE DENIED TO PICK UP

AND DEFENDANTS DESTROYED THEM. WRONGDOINGS.

- 106. Multiple times, Plaintiff requested the Adar to pest control the apartment for bed bug was denied.
- 107. After kicked out of Apartment, plaintiff was not allowed to pickup the values including Sony camera with pink cover has many gibabytes of photos which belong to my daughter with family photos.
- 108. Adar employee told that all the plaintiff belongs are destroyed.
- 109. Plaintiff was not allowed to pickup this disability, life supporting medicine from the room. Without medicine, disability is painful to the plaintiff.

o) TIMELY ADMINISTRATIVE CLAIM/PROCEEDING

- 110. Plaintiff filed administrative/claim proceeding with New York City and got the number 202300116247
- 111. Also Plaintiff requested the help of New York State's attorney general for the civil rights claims against NY City.

p) FRED'S WRONGDOINGS CONTINUES UNTIL TODAY AND GOES ON.

- 112. Until drafting the complaint, Fred kept on threatening the plaintiff.

IX. CAUSE OF ACTIONS

a) AGAINST LOCAL GOVTS

Count:1 False arrest

- 113. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
- 114. Because of Plaintiff requested US citizen plaintiff requested protection against illegal alien, arresting, locking, assigning prisoner to plaintiff is **false arrest**.
- 115. The Defendant NYC/NYPD's conduct as alleged above constitutes False Arrest in violation of 4th amendment, Section 1983/1988, NYS

human rights, NYC Human rights, as set forth in paragraph 58 to 66 above

Count:2 False prosecution

116. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

117. Because of Plaintiff requested US citizen plaintiff requested protection against illegal alien, arresting, locking, assigning prisoner to plaintiff is **false prosecution**.

118. The Defendant NYC/NYPD's conduct as alleged above constitutes False prosecution in violation of 4th amendment, Section 1983/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:3 False jailing

119. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

120. Because of Plaintiff requested US citizen plaintiff requested protection against illegal alien, arresting, locking, assigning prisoner to plaintiff is **false prosecution**.

The Defendant NYC/NYPD's conduct as alleged above constitutes False Jailing in violation of 4th amendment, Section 1983/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:4 Racial Discrimination

121. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

122. Because of Plaintiff is Hindu, Because of police supervisor is Muslim, Fred is Christian, arresting, locking, assigning prisoner to plaintiff is **Racial discrimination**.

123. The Defendant NYC/NYPD's conduct as alleged above constitutes Racial Discrimination in violation of 14th amendment, Section 1983/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:5 Disability Status – Medicine denied.

124. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
125. Plaintiff was arrested, locked and refused to arrange diabetic medicine, diabetic medicine unavailable, pain medicine when the blood glucose level was extreme which caused fainting to the plaintiff is **disability violation**.
126. The Defendant NYC/NYPD's conduct as alleged above constitutes disability discrimination in violation of 14th amendment, Americans with Disabilities Act, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:6 Failed to protect the US Citizen from illegal alien

127. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
128. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and refused to arrange diabetic medicine, pain medicine when the blood glucose level was extreme which caused fainting to the plaintiff is **violation in Civil rights of US citizen**.
129. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes Failed to protect the US Citizen in violation of 14th amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:7 Favoring foreigner against US Citizen

130. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
131. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and refused to arrange diabetic medicine, pain medicine when the blood glucose level was extreme which caused fainting to the plaintiff is **violation in Civil rights of US citizen**.
132. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes Favoring foreigner against US citizen in violation of 14th amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:8 Cruel Punishment – denied sleep

133. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
134. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and denied right to sleep is unusual, cruel punishment to plaintiff.
135. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes unusual, cruel punishment in violation of 8thth amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:9 Cruel Punishment – denied food

136. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
137. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and denied right to sleep is unusual, cruel punishment to plaintiff.
138. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes unusual, cruel punishment in violation of 1st amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:10 National Origin - Discrimination

139. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
140. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and denied release, set the hearing for later date because of Plaintiff is Indian origin and the arrested officer is Pakistani origin, is National Origin violation to plaintiff.
141. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes National Origin violation of 14th amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, as set forth in paragraph 58 to 70 above

Count:11 Intentional Infliction of Emotional Distress

142. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

143. Because of plaintiff requested the Local govt defendant to protect against illegal alien, Plaintiff was arrested, locked and denied denial or unavailable of medicine for disability is **Intentional Infliction of Emotional Distress** which no none in the civilized society should accept.
144. The Defendant NY State, NYC/NYPD's conduct as alleged above constitutes **Intentional Infliction of Emotional Distress** violation of 14th amendment, Section 1983/1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 58 to 70 above

b) AGAINST LANDLORD/CO-LANDLORD

Count:12 Failed to provide inhabitable room

145. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
146. Plaintiff was given room with bed-bug and refused to pest control is violation of **failed to provide inhabitable room**.
147. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **failed to provide inhabitable room** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:13 Race/Ethnicity discrimination

148. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
149. Because of defendant Pravin is upper caste, Plaintiff is not upper case, Pravin disallowed the plaintiff to cook egg for diabetic need is **Racial/ethnicity** discrimination, but Pravin allowed the other people cook/eat non-veg on the apartment.
150. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Racial/ethnicity** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:14 Obstruction of Justice.

151. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
152. Pravin said do not believe in US Constitution
153. Pravin refused to give the Supreme Court order for appeal and said bad words about court order is **obstruction of justice** by Pravin .
154. Each Defendant Pravin's conduct as alleged above constitutes **Obstruction of Justice** violation of 18 USC Ch. 73
155. Relief() Plaintiff prays this court for Jail the defendant Pravin for two years and depart him back to India.

Count:15 Disability –Status violation

156. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
157. Because of defendant Pravin is upper caste, Plaintiff is not upper case, Pravin disallowed the plaintiff to cook egg for diabetic need is **failure to accommodate disability** discrimination, but Pravin allowed the other people cook, eat non-veg on the apartment.
158. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Disability discrimination** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), ADA. Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:16 Racial/Ethnicity discrimination

159. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
160. Because of defendant Pravin is upper caste, Plaintiff is not upper case, Pravin disallowed the plaintiff to cook egg for diabetic need
And
Pravin did not allow the plaintiff to eat any non-veg for the plaintiff's diabetic need. Pravin said that **Black Madrasi, kill you if you cook egg in this apartment** is **Racial/Ethnicity** discrimination, but Pravin allowed the other people cook, eat non-veg on the apartment.

161. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Racial/ethnicity** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:17 Intentional infliction of emotional distress

162. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

163. Defendants refused to pest control the bed bug, plaintiff had mild heart attack is **Intentional infliction of emotional distress**

164. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Intentional infliction of emotional distress** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:18 Intentional infliction of emotional distress

165. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

166. Defendants refused to pest control the bed bug, plaintiff had mild heart attack is **Intentional infliction of emotional distress**

167. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Intentional infliction of emotional distress** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:19 Identity theft

168. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.

169. Defendants refused to give the plaintiff court order, letters, Plaintiff bank debit card, plaintiff further unable to get another debit card, plaintiff continue suffering without debit card is identity theft.

170. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes identity theft violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:20 Disparate treatment, less well treatment

171. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
172. Because of defendant Pravin is upper caste, Plaintiff is not upper case, Pravin disallowed the plaintiff to cook egg for diabetic need is **Disparate treatment, less well treatment** discrimination, but Pravin allowed the other people cook, eat non-veg on the apartment.
173. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Disparate treatment, less well treatment** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), ADA. Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 76 to 90 above

Count:21 Illegally denied accommodation/kicked out the room.

174. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
175. Because plaintiff told Pravin that he should respect the US constitution and Supreme Court order, requested pest control the apartment for bedbug plaintiff was kicked out of apartment. Plaintiff told Pravin that he need to go to court to kick the plaintiff out of room, Pravin said who the heck court in the apartment.
176. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **illegally denied accommodation** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 103 to 108 above

Count:22 Landlord/co-landlord denied plaintiff pick up his belongings/copyright photos lost.

177. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
178. Pravin told the plaintiff that he should kill the plaintiff if plaintiff pickup the belongings.
179. Adar told that they should not allow the plaintiff to pick up the belongings.
180. Adar destroyed the plaintiffs belongings and camera and photos.
181. Each Defendant Pravin, Raja, Adar's conduct as alleged above constitutes **Property damage, property lost, copy right**

images/photo lost violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Copy right act, Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 103 to 108 above

Count:23 Landlord/co-landlord failed to protect the plaintiff from Fred

182. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
183. Fred yelled "**Kill you Madrasi**" punched the plaintiff between jaw and ear with his closed fingers and injured the plaintiff, plaintiff seek emergency, got strong pain killer for the injuries.
184. Defendant Fred's conduct as alleged above constitutes **Racial assault** of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 45 to 46 above

c) AGAINST FRED

Count:24 Racial/Ethnicity Discrimination

185. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
186. Fred yelled "**Kill you Madrasi**" punched the plaintiff between jaw and ear with his closed fingers
187. Defendant Fred's conduct as alleged above constitutes **Racial/ethnicity discrimination** violation of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section 1981/1988, NYS human rights, NYC Human rights, Ny/NYC common law as set forth in paragraph 45 to 46 above

Count:25 Racially assaulting /injury

188. The Plaintiffs realleged and incorporated by reference paragraphs 1 to 112 of this complaint.
189. Fred yelled "**Kill you Madrasi**" punched the plaintiff between jaw and ear with his closed fingers and injured the plaintiff, plaintiff seek emergency, got strong pain killer for the injuries.
190. Defendant Fred's conduct as alleged above constitutes **Racial assault** of Fair Housing Act (FHA) /Fair Housing Amendments Act (FHAA), Section

1981/1988, NYS human rights, NYC Human rights, Ny/NYC
common law as set forth in paragraph 45 to 46 above

191. Relief() Plaintiff prays this court to order the defendant Fred to jail 2
year and deport him back to India.

X. RELIEF

- a) Plaintiff prays this court to appoint attorney to the plaintiff.
Plaintiff is suffering from disability(s) and unable to find attorney.
- b) Plaintiff prays this court for Each claim each defendant need to
pay reasonable money compensation to the plaintiff.
- c) Plaintiff prays this court for an injunctive order to Restructure the
NY State courts into 3–tier which is similar to Federal Courts
Structure/hierarchy.
- d) Plaintiff prays this court for an injunctive order to consolidate the
NY State’s Appellate Divisions of Supreme and Appellate Terms of
Supreme Courts.
- e) Plaintiff Prays this Court for an injunctive order that
 - i) Politician/governor/Mayor(s), Chief Administrative
Judge/Officer/justice should not appoint Judges/Justices in New
York’s Courts.
 - ii) Judges/Justices should not be appointed by election.
 - iii) New York Judges/Justice should be appointed by collegium
process.
- f) Plaintiff prays this court for an injunctive order that
 - i) Increase Number of Justices in NY Court of Appeals to 34.
 - ii) Court of Appeal justices should be appointed from NY
Appellant Court’s Judges thru collegium process without violating
Age. Race
 - iii) NY Court of appeals Justices should retire at age 70 or 5 years
of service with NY Court of appeals whichever comes 1st.
 - iv) When Chief Justice of NY Court of Appeals retire/vacant, one
of the associate justice of Court of Appeals should be promoted
without violation race/age.
- g) When vacant in the Appellate Court, Trial Court (3rd tier) Judges
should be appointed thru collegium process without violating
race/age. Appellant court judges should retire at age 70;

When Chief Judge of appellate court is retire/vacant, one of the appellate Court's judge should be promoted without violating age/race.

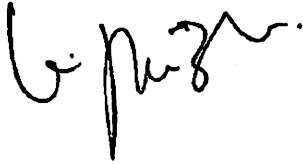
- h) Trial court judges should be appointed thru collegium process without age , race discrimination and they should retired at 70
- i) Plaintiff prays this court for reasonable legal expense and reasonable money compensation for pain and suffering on this litigation.
- j) Plaintiff prays this court for any and all benefits/reliefs plaintiffs entitled by this action.

k)

XI. DEMAND FOR JURY TRIAL

192. Plaintiff Palani Karupaiyan demands a trial by jury of all issues so triable in this action.

Respectfully submitted



Palani Karupaiyan

Ph: 212-470-2048(m) palanikay@gmail.com

XII. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

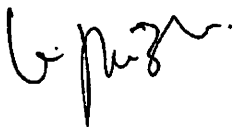
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: ___Jul 9 2023

Signature of Plaintiff _____

Printed Name of Plaintiff _____ Palani Karupaiyan



JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Palani Karupaiyan

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

prose
212-470-2048**DEFENDANTS**

State of New York

County of Residence of First Listed Defendant Kings
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUL 12 2023 ★

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
section 1981/1983/1988, Fair housing act, NYS/NYC human rightsBrief description of cause:
false arrest, fair housing**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint.

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

Jul 10 2023

SIGNATURE OF ATTORNEY OF RECORD

prose /s/ k.pazhani

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

To

Prose office/Clerk
US Dist Court EDNY
Cadman Plaza East.
Brooklyn, NY 11201

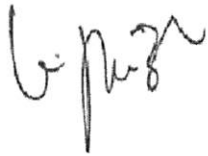
Date: Jul 10 2023

Dear Sir/Ma'm

Please file this new Complaint and please notify me thru ECF at palanikay@gmail.com

I will try to serve the complaint as soon as possible

Thanks for your time and attention





Palani Karupaiyan
212 470 2048(m)
1236 W William St
Philadelphia, PA 19132

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 12 2023 ★

BROOKLYN OFFICE

Handwritten: B 7/18/23

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